U.S. Department of Transportation
United States Coast Guard

Commandant (G-SCT-2)
U.S. Coast Guard

2100 Second St SW
Washington DC 20593
Staff Symbol: G-SCT-2
Phone: (202) 267-1358
FAX: (202) 267-4106
CGComms@comdt.uscg.mil

02400
14 January 2000

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington DC 20554

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Dear Ms Salas:

The following are comments of the U.S. Coast Guard concerning WT Docket No. 99-332, Amendment of Parts 0, 80 and 90 of the Commission's Rules to make the Frequency 156.250 MHz Available for Port Operations Purposes in Los Angeles and Long Beach, CA Ports (21 Dec. 1999 Federal Register, p71369).

The U.S. Coast Guard supports the proposal of the Commission to use marine VHF channel 05A (156.250 MHz) in the Los Angeles and Long Beach port areas for intership port operations to alleviate the communications congestion related to port operations. We further support the Commission's proposal to authorize the Chief, Wireless Telecommunications Bureau, to amend the maritime service rules at our request to allow this same type of solution at other ports.

Although 156.250 MHz is located on a band edge between maritime and land mobile assignments, we believe it is the best frequency for the proposed application. Approximately one million VHF marine radios licensed by the Commission by rule and capable of transmitting on this frequency already operate in maritime areas throughout the U.S. Designating this frequency for intership port operations should not in any way significantly affect land mobile operations.

The U.S. Coast Guard supports the efforts of the Ports of Los Angles/Long Beach (LA/LB) to obtain another operating frequency to facilitate safe, efficient and environmentally sound maritime operations in the Port complex and adjacent waterways. Contingent with this support, we may need to monitor and respond on appropriate frequencies as urgent circumstances arise. Furthermore, with the development of burgeoning automatic identification system technologies, we foresee a need to coordinate frequency uses in the near future to ensure good stewardship of the maritime band. The Captain of the Port (COTP) has stated that "Safe port operation is the number one priority in LA/LB. This entails establishing a "seamless" Vessel Traffic Management System (VTMS) which provides reliable, accurate and timely information to those coordinating vessel movements. It is vital for the LA/LB port system (including the Coast Guard COTP) to address the role of the human element in preventing maritime casualties. An accident that shuts the third busiest port complex in the world down for 24-48 hours would have a severe

and immediate negative impact on the U.S. economy." Effective radio communications is a vital part of this human element role.

This port complex moves a huge amount of containers and oil and is growing commercially by the minute, yet it is very compact. Navigation channels are getting deeper, the LA main channel is currently being dredged to 81 feet and huge new pier complexes are being poured into what used to be open water. In 1995 there were about 70 container cranes between both ports. At last count there are 120 cranes and the new Pier 400 project will provide space for a minimum of 16 more. The amount of ship traffic has also doubled since 1994 - going from 70 per day to 140. Pilots and tug operators have experienced confusion due to the congestion of traffic on the designated communications channel. Key commands are inadvertently "stepped-on" (disrupted by interference from a second transmitter) on a regular basis. This information has been documented. For example, the Jacobsen Pilot Service, a local ship pilot company, has tape recordings demonstrating the increased risk of maneuvering ships under the current situation. The critical periods in LA/LB are morning and evening "rush hours" where it is typical for each port to be working five ships each. The risk of a confused order, transmission "step-on", or other communications failure is high. Additionally, container operators extensively use hand held radios that bleed over channels. Communications problems are almost always at the heart of a Human Element ("Prevention Through People") related system error/breakdown.

COTP LA/LB believes this is an urgent safety matter that needs to be remedied soon. Mariners are telling the Coast Guard through Harbor Safety Committees and through other informal feedback sessions that relief is needed for this communications problem. Besides eliminating potential confusion, the USCG and both local pilot associations would be in a much better posture to identify and gauge the tempo of operations and progress of vessel movements under this system.

Sincerely,

J. D. HERSEY, JR.
Chief, Spectrum Management Division
By direction

Copy: Tom Sugrue, FCC WTB